

**EXHIBIT B**

**Proposed Order**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

Presentment Date: February 10, 2015  
Time: 12:00 p.m.

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Objections Due: February 10, 2015  
Time 11:00 a.m.

Plaintiff-Applicant,

Adv. Pro. No. 08-01789 (SMB)

v.

SIPA Liquidation

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

(Substantively Consolidated)

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

**ORDER GRANTING TRUSTEE'S APPLICATION TO RETAIN GOLDSTEIN &  
RUSSELL, P.C. AS SPECIAL COUNSEL *NUNC PRO TUNC* AS OF FEBRUARY 2, 2015**

Upon the Application (the "Application") of Irving H. Picard (the "Trustee"), as Trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC, and the estate of Bernard L. Madoff, for authority to retain Goldstein & Russell, P.C. as special counsel as of February 2, 2015, and upon the declaration of Thomas C. Goldstein submitted in connection therewith; and due and proper notice having been given under the circumstances of this case, and after due deliberation,

IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED.
2. The Court finds that Goldstein & Russell, P.C. is deemed disinterested under 15 U.S.C. § 78eee(b)(6)(B).

3. The Trustee is authorized to retain Goldstein & Russell, P.C. as special counsel to the Trustee as provided in the Application, *nunc pro tunc*, as of February 2, 2015.

Dated: New York, New York  
\_\_\_\_\_, 2015

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HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE